

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ARSALAN FAGHRI,  
FERESHTEH AMINI and  
ROUDABEH FAGHRI,

Plaintiffs,

v.

SECRETARY MICHAEL CHERTOFF, et al.,

Defendants.

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Civil Action No. 06-777-\*\*\*

**UNOPPOSED MOTION FOR EXTENSION OF TIME**

COMES NOW the United States of America, by and through its attorneys, Colm F. Connolly, United States Attorney for the District of Delaware, and Ellen W. Slights, Assistant United States Attorney for the District of Delaware, and respectfully moves this Honorable Court for an extension of time in the above case, until Friday, April 13, 2007, for defendants to file their response to the Complaint. In support thereof, the United States alleges that:

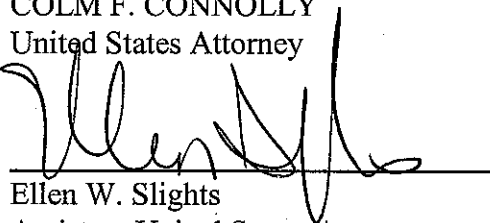
1. On or about December 20, 2006, plaintiffs filed their Original Complaint for Writ of Mandamus ("Complaint") seeking to compel the processing of an adjustment of status request filed with the United States Citizenship and Immigration Services.
2. The Government's response to plaintiffs' Complaint is due on April 9, 2007.
3. The undersigned counsel has only very recently received the information necessary to prepare a response to the plaintiffs' Complaint. Counsel requests this four day extension to obtain further information and to allow the government time to formulate an adequate response.
4. The undersigned counsel contacted plaintiffs' counsel, Ms. Badmus, regarding this motion seeking enlargement of time in which to respond to the Complaint. Ms. Badmus

indicated plaintiffs have no objection to such an enlargement of time and the plaintiffs do not oppose the Government's motion.

Wherefore, the United States requests that it be allowed until Friday, April 13, 2007, to file its response to the plaintiffs' Complaint.

COLM F. CONNOLLY  
United States Attorney

By:



Ellen W. Slights  
Assistant United States Attorney  
Delaware Bar I.D. 2782  
1007 Orange Street, Suite 700  
Post Office Box 2046  
Wilmington, Delaware 19899-2046  
(302) 573-6277

Attorneys for Defendants

Dated: April 9, 2007

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**ORDER**

UPON CONSIDERATION of the United States' Unopposed Motion for Extension of Time, the grounds stated therefor, the plaintiffs' lack of opposition thereto, and the entire record herein, it is this \_\_\_\_\_ day of \_\_\_\_\_, 2007, hereby

ORDERED that the United States' motion should be and it is hereby granted; and it is,

FURTHER ORDERED that the United States' Answer to plaintiffs' Complaint shall be filed on or before Friday, April 13, 2007.

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J.

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**AFFIDAVIT OF SERVICE**

I, Kathie Gray, an employee in the Office of the United States Attorney for the District of Delaware, hereby attest under penalty of perjury that on April 9, 2007, I electronically filed the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME** with the Clerk of Court using ECF, and I hereby attest that I have delivered two copies of said documents via United States Mail, postage prepaid, to the following:

Cynthia L. Carroll, Esquire  
260 Chapman Road  
Suite 201-D  
Newark, DE 19702

Ann Massey Badmus, Esquire  
Badmus Immigration Law Firm P.C.  
12700 Park Central Drive  
Suite 1910  
Dallas, TX 75251

*/s/ Kathie Gray*

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Kathie Gray  
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